

May 22, 1999

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Federal Communications Commission
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To The Commission:

The following are comments on the Notice of Proposed Rule Making for Low Power FM Services, (LPFM).

MM Docket No. 99-25 /

I have a FCC General Class Radio Telephone License, also many years of formal Electronics/Computer training, from 1970 to the present. Since 1972, I have been continuously employed as an Electronics Technician. I work at a Minnesota based Radio Reading Service. My primary responsibility is repairing, maintaining and calibrating broadcast and other analog and digital equipment.

I believe the Commission should permit LPFM broadcasting on the FM band by adopting the proposals in Docket No. 99-25. I support the Skinner Petition and the creation of a Low Power FM service (LPFM). I believe the FCC has skillfully crafted this proposal which allows several Low Power Classes of FM service that can truly serve the diverse communities and minority interests in America. This proposal adequately protects full service FM stations in terms of spectrum priority and signal contour protection.

Some comments I would like to make on a number of points raised in this proposal:

- All three levels of power should be allowed: 10 watt, LP 100, LP 1000.
- The LPFM services should be allowed to apply for any available FM channel located in the 88 MHz. to 108 MHz. spectrum. The proposed LPFM signal would have to meet FCC rules concerning non-interference with the signals of existing LP 1000 and full service FM stations.
- Second and third adjacent FM channel signal interference should not be considered, since no viable, in band, Digital FM System is presently available. Most test data on In Band Digital FM have shown them to be disappointing in performance, at best. The non-protected status of LPFM services channels, in this proposal, will allow full service FM stations to upgrade to some future In Band Digital FM broadcast system.
- Translators and repeaters should be protected 'grand fathered' --if the originating station is within 100 miles of said translator or repeater
- Applications for 10 watt service should be allowed to be made via the Internet and their licenses should be granted for 2 years, and then require renewal.

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- Contact for obtaining written application forms for LP 100 and LP 1000 stations should be able to be obtained from the FCC via a Internet web-site. Given the increased expense in operating and building a LP 100 or 1000 station, interested parties should be required to show dedication and long term commitment to putting and keeping such a station on the air. Licenses should be granted for 4 years and require renewal.
- Construction permits should be issued for a term of 1 year. For LP 100 and LP 1000 stations, extension, of that permit, for an additional 2 years should be allowed.
- No cross ownership between full service and Low Power FM stations should be allowed. An exception for cross ownership could be made, if LPFM stations were put into a 'Blind Trust' type of arrangement.
- Limits should be placed on the number of LPFM stations an individual, organization or company could own. I would suggest a limit of 10 LPFM stations maximum.
- A minimum amount of hours should be required for local programming.
- LP 100 and LP 1000 stations should have minimum number of hours for operation, similar to the present lowest class FM service.
- To finance station operations, LPFM stations should be given the ability to air enhanced underwriting announcements, similar to those presently aired on non-commercial radio and TV stations.

In conclusion: the proposals contained in Docket No. 99-25 should be adopted into the FCC rules. This type of LPFM service is needed when specialty programming, offered currently, by commercial FM stations, in Minneapolis/St. Paul market consisted of only 4 hours of 'Oldies' programming and ZERO hours of foreign language/ethnic programming, [source: Broadcasting and Cable Yearbook]. With full service FM stations in Mpls./St. Paul costing 30 MILLION dollars to purchase, LPFM will allow groups, organizations, companies and individuals to enter broadcasting in an affordable manner. LPFM will provide a source for diverse, creative, local, ethnic and experimental programming, presently ignored by today's broadcasters.

Respectfully Submitted,



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